

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>No. 1:CR-01-72-02</b>
	:	
<b>v.</b>	:	
	:	
<b>CHELSEA YOCUM</b>	:	

**MOTION TO CONTINUE SENTENCING HEARING**

AND NOW, comes Chelsea Yocum, by and through counsel, and files the within motion to continue the sentencing hearing:

1. Defendant is Chelsea Yocum.
2. By order of court of May 11, 2005, the undersigned counsel was appointed to represent the above mentioned defendant.
3. Since the appointment of the undersigned counsel the undersigned has engaged in correspondence with the defendant at the federal correction institution in Danbury, Connecticut.
4. The undersigned counsel has also contacted Peter Lavin, previous appellate counsel, in an effort to learn more about the defendant's case.
5. Counsel has also spoken with the defendant's mother in connection with the defendant's case.
6. The undersigned counsel is currently trying to gather all the paperwork that will be relevant for the defendant's sentencing hearing, but none of the paperwork has yet been received.
7. Because of the need to carefully review all the previous paperwork, and to gather that paperwork from previous counsel, it is not believed that the undersigned counsel and the

defendant can be ready for the sentencing hearing, which is currently scheduled for June 28, 2005.

8. It is believed that an additional thirty (30) days from June 28 will be reasonable and necessary to adequately prepare for defendant's sentencing hearing.

9. The undersigned counsel has contacted Attorney Christy Fawcett and Attorney Fawcett concurs in the defendant's request to continue the sentencing hearing.

WHEREFORE, based on the foregoing, it is respectfully requested that this Honorable Court reschedule the defendant's sentencing hearing to a date at least thirty (30) days after June 28, 2005.

Respectfully submitted,

/s/ Gerald A. Lord

Gerald A. Lord, Esquire  
Miller, Poole & Lord, LLP  
139 East Philadelphia Street  
York, PA 17403  
(717) 845-1524  
Sup. Ct. I.D. No. 49539

**CERTIFICATE OF CONCURRENCE**

I, Gerald A. Lord, hereby certify that my office contacted counsel for the respondent, Christy Fawcett, and Attorney Fawcett is not opposed to counsel's request for a continuance of the sentencing hearing.

Date: June 16, 2005

s/ Gerald A. Lord